To: Webster, David[Webster.David@epa.gov]; Hoagland, Matt[Hoagland.Matt@epa.gov]; Murphy,

Thelma (Hamilton)[murphy.thelma@epa.gov]

From: Houlihan, Damien

Sent: Tue 10/7/2014 8:42:56 PM **Subject:** RE: Priority Permit Lists

Non-Responsive, Deliberative Process

Damien

From: Webster, David

Sent: Tuesday, October 07, 2014 4:17 PM

To: Houlihan, Damien; Hoagland, Matt; Murphy, Thelma (Hamilton)

Subject: Priority Permit Lists

Damien, Thelma, Matt,

Going into FY15 I need to select 15 "National Priority Permits" in MA and 5 in NH. These are not necessarily the highest priority or most significant in the regions, but rather permits that are important for one reason or another, that we have a high probability of issuing in FY15. For each, I will need to justify with one of the reasons listed later in this note. By no means does it diminish the importance of other permits, which after are higher "Regional Priorities," which I will identify separately at the end of this note. I welcome your comments and suggestions.

I seek your input on this. Here's my initial designation of these 15 "National Priority Permits."

A. MA Proposed National Priority Permits:

Non-Responsive, Deliberative Process
B. NH Proposed National Priority Permits:
Non-Responsive, Deliberative Process
 C. OW Reasons for selecting National Priority Permits a. National program priority (CAFO)

b. Significant changes to facility's operations

- c. National program priority (CSO)
- d. Discharge to drinking water resources
- e. Revised effluent limitations guidelines
- f. Protection of an endangered species
- g. Environmental justice
- h. Facility located on priority watershed
- i. Permit is more than 10 years expired
- k. Discharge to an impaired water body (i.e., water body on 303(d) list)
- 1. Implementation of a WLA from a TMDL
- m. Revised water quality standards
- o. Other. If "Other" is selected, an explanation/description must also be provided.

<u>Regional Priority Permits</u> (not including previously mentioned National Priority Permits - consider these in your assignments. H=high priority. Let me know your comments, suggestions, considerations I may have forgot or not known about, or if you want my rationale.

1. Stormwater, GPs & CSO (MA & NH)

2. <u>Municipal – MA</u>
Non-Responsive, Deliberative Process

Non-Responsive, Deliberative Process
3. <u>Municipal – NH</u>
Non-Responsive, Deliberative Process

Non-Responsive, Deliberative Process

4. Industrial - MA

Non-Responsive, Deliberative Process

5. <u>Industrial – NH</u>

H – PSNH Merrimack

Non-Responsive, Deliberative Process

6. Maine